

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

IN RE PORK ANTITRUST LITIGATION

Civil No. 18-1776 (JRT/HB)

This Document Relates to:

ALL CONSUMER INDIRECT  
PURCHASER ACTIONS

**DECLARATION OF PAUL LLP IN  
SUPPORT OF PLAINTIFFS'  
MOTION FOR AN AWARD OF  
ATTORNEYS' FEES AND  
LITIGATION EXPENSES  
SUBMITTED ON BEHALF OF  
PLAINTIFFS**

I, Ashlea Schwarz, hereby declare and state as follows:

1. I am a partner of Paul LLP. I submit this declaration in support of Plaintiffs' Motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the above-captioned action (the "Action"). I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Counsel in this matter for Plaintiffs.

3. Attached hereto as **Exhibit 1** is my firm's total hours and lodestar, computed at current rates, for the period from inception of the case through June 30, 2021. The total number of hours spent by my firm during this time period was 42.5 with a corresponding current lodestar of \$17,233.50.<sup>1</sup> This summary was prepared from contemporaneous,

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<sup>1</sup> Such time does not include any time expended in completing this declaration.

daily time records regularly prepared and maintained by the firm. The lodestar amount reflected in **Exhibit 1** is for work assigned by Plaintiffs' Co-Lead Counsel and was performed by professional staff at my law firm for the benefit of the Class/Plaintiffs during the aforementioned time period. In preparing this time, I followed Lead Counsel's protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing Plaintiffs in the Action, my firm did the following:

- Analyzed the potential claims under various state laws;
- Drafted the complaint;
- Interviewed and analyzed potential class representatives to identify those with the significant damages and proof of purchase for various states;
- Participated in the discovery process, including assisting clients in responding to written discovery, producing documents, and conducting electronic searches of their computers; and
- Continually communicating with class representatives to ensure compliance with their duties and to fully litigate this case.

The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$ 55.48 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including June 30, 2021. These costs and expenses are set forth in the chart attached as **Exhibit 2** and reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 6, 2021 in Kansas City, Missouri.

s/ Ashlea Schwarz  
Ashlea Schwarz

**EXHIBIT 1****PAUL LLP****Reported Hours and Lodestar**

Inception through June 30, 2021

<b>Timekeeper</b>	<b>Professional Status</b>	<b>Hours</b>	<b>Current Rate</b>	<b>Total Lodestar</b>
Richard Paul	Partner	3.4	\$825	\$2,805
Ashlea Schwarz	Partner	6.8	\$700	\$4,760
Sean Cooper	Partner	8.2	\$625	\$3,731
Kendra John	Senior Litigation Paralegal	4.3	\$275	\$1,182.50
Linda Davis	Litigation Paralegal	5.5	\$250	\$1,375
Patrick Neal	Litigation Paralegal	10.4	\$250	\$2,600
Andrea Herron	Law Clerk	3.9	\$200	\$780
<b>Grand Total</b>		42.5		\$17,233.50

**Exhibit 2****PAUL LLP****Expenses Incurred**

Inception through June 30, 2021

<b>Expense Category</b>	<b>Amount Incurred</b>
Electronic Research (Lexis/Westlaw/PACER)	\$52.10
Court Costs – Filing Fees	\$0
Litigation Fund Contribution	\$0
Express Delivery/Messengers	\$0
Photocopies – In House	\$2.36
Photocopies – Outside	\$0
Postage	\$1.02
Service of Process Fees	\$0
Telephone / Fax	\$0
Transportation / Meals / Lodging	\$0
Experts/Consultant Fees	\$0
Court Reporter Service/Hearing Transcript Fees	\$0
<b>TOTAL EXPENSES</b>	<b>\$55.48</b>